

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Case No.: 3:23-cv-819-FDW-DCK

JANE DOE, BY AND THROUGH HER
PARENTS JANE ROE AND JOHN ROE,

Plaintiffs,

vs.

AMERICAN AIRLINES GROUP, INC.;
ESTES CARTER THOMPSON, III; and
DOES 2-10,

Defendants.

**JOINT MOTION TO
APPROVE CONFIDENTIAL MINOR
SETTLEMENT**

Plaintiffs Jane and John Roe, as the natural parents and legal guardians of Jane Doe, a minor (“Plaintiffs”) and Defendant American Airlines Group, Inc. (“American Airlines”), jointly move the Court to approve the terms and conditions of a proposed confidential settlement of all claims Plaintiffs asserted against Defendants. Plaintiffs and American Airlines will provide the Court with a copy of a fully executed Confidential Mutual Settlement Agreement and Release of All Claims (“Confidential Settlement Agreement”) at the hearing, along with other related documents which effectuate the terms of the parties’ confidential settlement. To preserve confidentiality, the Parties request that any documents submitted to the Court prior to, during, or following the hearing as well as statements of counsel made during the hearing be kept under seal pursuant to Local Rule 6.1

Plaintiffs Jane and John Roe, Jane Doe’s natural parents, have fully and carefully considered this settlement offer and are of the opinion that under the circumstances, this offer of settlement is reasonable and proper and in the best interests of the minor-plaintiff and adequately protects the minor-plaintiff’s interests.

WHEREFORE, Plaintiff and Defendant American Airlines seek the Court's approval of the Confidential Settlement Agreement entered into between Plaintiff and American Airlines.

Respectfully submitted this the 13th day of February, 2025.

JAMES, McELROY & DIEHL, P.A.

/s/ John R. Buric

John R. Buric (NCSB 22688)

John R. Brickley (NCSB 41126)

525 N. Tryon Street, Suite 700

Charlotte, North Carolina 28202

Email: jburic@jmdlaw.com

jbrickley@jmdlaw.com

Attorneys for Plaintiff

BAKER DONELSON

/s/ William M. Starr

William M. Starr (NCSB 31813)

101 South Tryon Street, Suite 3600

Charlotte, NC 28280

Email: bstarr@bakerdonelson.com

*Attorneys for Defendant American Airlines
Group, Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies that this **JOINT MOTION TO APPROVE CONFIDENTIAL MINOR SETTLEMENT** has this date been electronically filed with the Clerk of Court of the United States District Court of the Western District of North Carolina using such Court's CM/ECF system, which will transmit notification of such filing, constituting service thereof, to Defendant American Airlines Group, Inc.'s counsel of record as follows:

William M. Starr – bstarr@bakerdonelson.com

And served on Estes Carter Thompson, III, by depositing a copy thereof in the United States Mail, sufficient first-class postage prepaid, addressed as follows:

Estes Carter Thompson, III
Wyatt Detention Facility
950 High Street
Central Falls, Rhode Island 02863

This the 13th day of February, 2025.

LEWIS & LLEWELLYN LLP

s/ Paul T. Llewellyn

Paul T. Llewellyn, CA State Bar No. 216887
Admitted Pro Hac Vice
Erin H. Reding, CA State Bar No. 252691
Admitted Pro Hac Vice
601 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: (415) 800-0590
Facsimile: (415) 390-2127
Email: pllewellyn@lewisllewellyn.com
ereding@lewisllewellyn.com
Counsel for Plaintiff Jane Doe

JAMES, McELROY & DIEHL, P.A.

s/ John R. Buric

John R. Buric, N.C. State Bar No. 22688
John R. Brickley, N.C. State Bar No. 41126
525 N. Tryon Street, Suite 700
Charlotte, North Carolina 28202
Telephone: (704) 372-9870
Facsimile: (704) 333-5508
Email: jburic@jmdlaw.com
jbrickley@jmdlaw.com
Counsel for Plaintiff Jane Doe